

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

\*\*\*\*\*

UNITED STATES OF AMERICA,

v.

(1) BARRY CADDEN

(2) GLENN A. CHINN,

(3) GENE SVIRSKY

(4) CHRISTOPHER M. LEARY

(5) JOSEPH EVANOSKY

(6) SCOTT M. CONNOLLY

(7) SHARON P.CARTER

(8) ALLA V. STEPANETS

(9) GREGORY A. CONIGLIARO

(10) ROBERT A. RONZIO

(11) KATHY S. CHIN

(12) MICHELLE L. THOMAS

(13) CARLA R. CONIGLIARO

(14) DOUGLAS A. CONIGLIARO

Defendants

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Case No. 14-CR-10363-RGS-JCB

**ASSENTED TO MOTION TO TEMPORARILY ENLARGE**  
**CONDITIONS OF RELEASE**

NOW COMES the Defendant Scott M. Connolly, by and through undersigned counsel and respectfully requests this Court temporarily enlarge the Conditions of Release to include travel to the State of New York. As reasons therefore, the Defendant states as follows:

1. Scott M. Connolly has been charged with racketeering and mail fraud in violation of 18 U.S.C. §§ 1962 and 1341, and the matter is currently pending in the United States District Court;
2. Mr. Connolly is on Pretrial Release on personal recognizance in this matter;
3. Mr. Connolly respectfully requests permission to travel to Holbrook, New York on March 24-26 to visit with family. He has supplied the United States with the information where he is staying and has surrendered his United States passport;
4. Pre-trial Services Officer Charleen Jenkins has indicated that Pretrial Services has no objection to this request;
5. The Assistant United States Attorneys in this matter, George Varghese and Amanda Strachan, expressly assent to this motion based upon the conditions listed above.

SCOTT M. CONNOLLY

By his attorney,

/s/Raymond Sayeg  
Raymond Sayeg, Esq.  
Krattenmaker O'Connor & Ingber  
P.C.  
One McKinley Square, 5<sup>th</sup> Floor  
Boston, MA 02109  
(617) 523-1010  
(BBO NO. 555437)

Dated: March 14, 2016

**CERTIFICATE OF SERVICE**

I, Raymond Sayeg, hereby certify that the foregoing document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic (NEF) on March 14, 2015.

s/ Raymond Sayeg  
Raymond Sayeg